

**IN THE UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF TEXAS**

LARRY KLAYMAN,

Plaintiff,

v.

BARACK HUSSEIN OBAMA, et al

Defendants.

Civil Action No.: 3:16-cv-02010-L

**PLAINTIFF LARRY KLAYMAN’S MOTION FOR EXTENSION OF TIME TO FILE
RESPONSE TO DEFENDANT FARRAKHAN’S MOTION TO DISMISS**

Plaintiff Larry Klayman (“Plaintiff”) hereby respectfully submits this Motion for Extension of Time to File an Opposition to Defendant Louis Farrakhan’s (“Defendant”) Motion to Dismiss, filed on August 7, 2016. (Docket No. 6).

Plaintiff requests this Court grant the requested 21-day extension of time, until and including September 19, 2016, to file Plaintiff’s Opposition to Defendant’s Motion to Dismiss. Plaintiff has been short staffed during the summer vacation season and some staff has been ill. Moreover, as this matter is still in its early stages, there will be no prejudice to any parties.

Pursuant to Local Rule 7.1, Plaintiff has sought consent from opposing counsel, Michael K Muhammad and, with full reservation of rights that he should not have been admitted *pro hac vice*, Abdul Arif Muhammad, but opposing counsel has discourteously and unprofessionally denied consent.

Apparently, Plaintiff, who is of Jewish origin, does not warrant professional courtesy from these defense counsel. Not coincidentally, the Nation of Islam, through its leader, Defendant Louis Farrakhan, and its followers, such as counsel for Defendant, is admittedly and

virulently anti-Semitic. It has, as documented in the complaint, openly incited violence and death against Jews, Christians, white and non-white law enforcement officers and others who are not associated with their radical strain of Black Muslim hateful and dangerous “ideology”. Plaintiff is not just Jewish and white, but also a former U.S. Department of Justice prosecutor and an officer of this federal court in this jurisdiction in Dallas by virtue of his membership to the trial bar of this court.¹

WHEREFORE, Plaintiff respectfully requests until and including September 19, 2016 to oppose Defendant’s Motion to Dismiss.

Dated: August 26, 2016

Respectfully submitted,

/s/ Larry Klayman
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CERTIFICATE OF CONFERENCE

Pursuant to Local Rule 7.1(b), Plaintiff engaged in a conference with Defendant’s counsel to determine whether Defendant opposed Plaintiff’s Motion for Extension of Time. This conference was held on August 25-26, 2016 between Plaintiff Larry Klayman and counsel for Defendant, Michael K Muhammad and, with full reservation that he should not have been admitted *pro hac vice*, Abdul Arif Muhammad. Plaintiff sought consent via e-mail on August 25, 2016 and counsel for Defendant responded on August 26, 2016. Plaintiff’s Motion for Extension

¹ This should serve as additional grounds to deny *pro hac vice* admission of Abdul Arif Muhammad.

of Time is opposed. Plaintiff's Motion is opposed because counsel for Defendant has declined to consent to Plaintiff's Motion.

CERTIFICATE OF SERVICE

I HEREBY CERTIFY that a true and correct copy of the foregoing PLAINTIFF'S MOTION FOR EXTENSION OF TIME was filed electronically and served through the court's ECF system to all counsel of record or parties on August 26, 2016.

/s/ Larry Klayman
Attorney